

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JOSE BALAREZO

Plaintiffs,

-against-

120 LIBERTY STREET LLC, ET. AL.,

Defendant.

See Rider Attached.

Case No.:

21 MC 102 (AKH)

Docket No.: 07CV1468

NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT

Jury Trial Demanded  
-----X

Defendants, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW EAST CONDOMINIUM, by their attorneys, CALLAN, KOSTER, BRADY & BRENNAN, LLP, adopts its Answer to the Master Complaint served by the answering defendants in 21 MC 102 (AKH) as its answer to the allegations set forth in the Complaint by Adoption (Check-Off Complaint). Pursuant to Case Management Order No. 4, this adoption of answer to the Master Complaint is deemed to deny the allegations of the Check-Off Complaint in this case. To the extent that defendants' Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above caption matter, defendants deny knowledge or information sufficient to form a belief as to the truth of such specific allegations.

Wherefore, the defendants demand judgment dismissing the above captioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York

*January 10, 2008*

Yours etc.,

CALLAN, KOSTER, BRADY & BRENNAN, LLP  
Attorneys for Defendants - BOARD OF  
MANAGERS OF THE HUDSON VIEW EAST  
CONDOMINIUM, HUDSON VIEW EAST  
CONDOMINIUM

By: 

Vincent A. Nagler (6400)

One Whitehall Street  
New York, New York 10004  
(212) 248-8800

TO: WORBY GRONER & NAPOLI BERN, LLP  
Plaintiffs Liaison  
In Re Lower Manhattan Disaster Site Litigation  
115 Broadway, 12th Floor  
New York, New York 10006  
(212) 267-3700

AO 440 (Rev 10/93) Summons in a Civil Action - SDNY WEB 4/99

# United States District Court

Southern

DISTRICT OF

New York

JOSE BALAREZO

## SUPPLEMENTAL SUMMONS IN A CIVIL CASE

V.

CASE NUMBER: (AKH)  
07CV1468

120 LIBERTY STREET LLC, ET. AL.,

SEE ATTACHED RIDER,

TO: (Name and address of defendant)

SEE ATTACHED RIDER

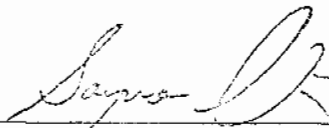
**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
115 Broadway, 12th Floor  
New York, New York 10006  
212-267-3700

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

**J. MICHAEL McMAHON**

CLERK



(BY) DEPUTY CLERK

DATE

SEP 20 2007

**RIDER**

JOSE BALAREZO,

Plaintiffs,

- against -

120 LIBERTY STREET LLC, 20 BROAD STREET CO., 233 BROADWAY OWNERS, LLC, 41 MADISON LP/ RUDIN MGMT CO, 55 WATER STREET CONDOMINIUM, 59 MAIDEN LANE ASSOCIATES, LLC, ALAN KASMAN DBA KASCO, ANN TAYLOR STORES CORPORATION, BATTERY PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC., BLACKMON-MOORING-STEAMATIC CATASTROPHE, INC. D/B/A BMS CAT, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HARRAH'S OPERATING COMPANY, INC., HILLMAN ENVIRONMENTAL GROUP, LLC., HILTON HOTELS CORPORATION, HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., MANUFACTURERS HANOVER TRUST COMPANY, MERRILL LYNCH & CO, INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEWLIBERTY PLAZA LP, NEW WATER STREET CORP., NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, R Y MANAGEMENT CO., INC., RY MANAGEMENT, SILVERSTEIN PROPERTIES, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA

CONDOMINIUM (CONDO #1178), TOSCORP  
INC., TUCKERANTHONY, INC., VERIZON  
NEW YORK, INC, VORNADO OFFICE  
MANAGEMENT LLC, WESTON SOLUTIONS,  
INC., WFP ONE LIBERTY PLAZA CO., L.P.,  
WFP ONE LIBERTY PLAZA, CO. GP, CORP.,  
WFP TOWER A CO., WFP TOWER A CO. G.P.  
CORP., WFP TOWER A. CO., L.P., WFP TOWER  
B CO. G.P. CORP., WFP TOWER B HOLDING  
CO., LP, WFP TOWER B. CO., L.P., WFP  
TOWER D CO. G.P. CORP., WFP TOWER D  
HOLDING CO. I L.P., WFP TOWER D  
HOLDING CO. II L.P., WFP TOWER D  
HOLDING I G.P. CORP., WFP TOWER D. CO.,  
L.P., AND WORLD FINANCIAL PROPERTIES,  
L.P., ET AL

Defendants. X

Defendants' Addresses: